

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: ANNIE D. LESTER

Case No. 19-12917

**CREDITOR'S, 1ST FRANKLIN FINANCIAL
CORPORATION'S, MOTION
FOR ABANDONMENT AND RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY**

COMES NOW, the Creditor, 1st Franklin Financial Corporation, by and through its attorney of record, and files this its Motion for Abandonment and Relief from Automatic Stay and Co-Debtor Stay, and in support thereof, would respectfully show unto this Honorable Court, as follows:

(1)

On July 23, 2019, Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code.

(2)

Creditor would show that the creditor holds an interest in the following property which secures this debt namely, a 2016 Toro zero turn riding lawn mower and Echo weedeaters (2).

(3)

That the Debtor and co-maker, Milton Clayton, have not been making the payments on the subject debt.

(4)

That the trustee and the debtor should abandon any interest that they may have in the collateral and the stay should be lifted as to the debtor and co-debtor, Milton Clayton.

WHEREFORE, Premises Considered, Creditor, 1st Franklin Financial Corporation prays that the Bankruptcy Court will abandon and surrender the above described collateral to 1st Franklin Financial Corporation and grant 1st Franklin Financial Corporation relief from the automatic stay as to the debtor and co-debtor, Milton Clayton, to collect the debt or repossess the collateral held by the Creditor herein.

RESPECTFULLY SUBMITTED, this the 27th day of August, 2019.

**1st Franklin Financial Corporation,
Creditor**

AKINS & ADAMS, P. A.

By:/s/ Bart M. Adams
Bart M. Adams
Attorney for 1st Franklin Financial
Corporation

AKINS & ADAMS, P. A.
108 E. JEFFERSON STREET
RIPLEY, MISSISSIPPI 38663
(662) 837-9976

CERTIFICATE OF SERVICE

I, Bart M. Adams, attorney of record for the Creditor, do hereby certify that the following parties, being registered with the CM/ECF system, have this day received electronic notification to:

Locke D. Barkley sbeasley@barkley13.com

U. S Trustee USTPRegion05.AB.ECF@usdoj.gov

Karen B. Schneller, Esq. karen.schneller@gmail.com

Milton Clayton
1224 HWY 349 S
Potts Camp, MS 38659-9702

SO, CERTIFIED, this, the 27th day of August, 2019.

/s/ Bart M. Adams
Bart M. Adams
Attorney for Creditor